



Dr. Tania Reneaum Panszi
Executive Secretary
Inter-American Commission on Human Rights
Organization of American States
1889 F Street, N.W.
Washington, D.C. 20006

August 15, 2022

Re: Request for a thematic hearing on life imprisonment in the Americas

Dear Executive Secretary Reneaum Panszi,

Pursuant to Article 64 of the Inter-American Commission on Human Rights' Rules of Procedure, we respectfully submit this request on behalf of the American Civil Liberties Union, The Sentencing Project, and Penal Reform International. We seek a thematic hearing on life imprisonment in the OAS region. This hearing is intended to provide the Commission with information on the use of life imprisonment in the United States and other OAS member states, the harm it causes, and the steps member states need to take to ensure that their practices comply with applicable human rights standards.

Life Imprisonment in the United States

The United States incarcerates almost two million people—more people, in both absolute numbers and per capita, than any other nation in the world.¹ The system of mass incarceration in the United States led to the use of extreme and unjust sentences.² Today, one in every seven people currently in prison—more than 200,000 people—is serving a life sentence of either life with parole, life without parole, or virtual life.³ Virtual life sentences are sentences given in a term of years—generally sentences of 50 years or longer before an opportunity of parole—that in practice amount to de facto life and life-without-parole sentences.⁴

The rate of growth of life sentences has outpaced even the explosive expansion of the overall prison population in the United States, and today there are more people sentenced to life in prison than there were people in prison serving any sentence in 1970. Those serving life sentences in the United States account for 40 percent all life-sentenced prisoners in the world.⁵

Racial disparities plague the entire criminal legal system from arrest to conviction, and these disparities are even more pronounced among those serving life sentences. Black and Latinx people are incarcerated at rates five and three times higher than white people, respectively.⁶ One in every

five Black men in prison is serving a life sentence and more than two-thirds of all people serving life sentences are people of color.⁷ Research has shown there are significant racial disparities in sentencing decisions, resulting in harsher sentencing outcomes because of race.

The United States' expansion of life imprisonment in recent decades developed as a result of changes in law, policies, and practices that lengthened sentences and limited parole.⁸ Beginning in the mid-1970s and increasing throughout the 1980s and 1990s, in response to increases in crime rates and reports about the prevalence of drug abuse and drug-related crime, lawmakers around the country enacted harsh mandatory minimum sentencing laws designed to severely punish the manufacture, use, and sale of drugs, among other crimes.⁹ Mandatory minimum laws require automatic prison terms for those convicted of certain federal and state crimes. These inflexible, often extremely lengthy, "one-size-fits-all" sentencing laws prevent judges from tailoring punishment to the individual and the seriousness of the offense, barring them from considering factors such as the individual's role in the offense or the likelihood he or she will commit a subsequent crime. In addition, in 1984, Congress created the U.S. Sentencing Commission, which established federal Sentencing Guidelines that apply in all federal cases and were intended to reduce sentencing disparities. The guidelines, however, set harsh mandatory sentences that lengthened prison times for a range of crimes and eliminated judicial discretion to craft individualized sentences.

The proliferation of habitual offender laws also contributed to the increase in arbitrary life sentences that are disproportionate to the crime. Currently, all 50 states and the federal government have some form of habitual offender or three-strikes law.¹⁰ These laws often are extremely harsh and not derived from a scientific understanding of crime, punishment, or deterrence. For example, some states, like Alabama and Georgia, mandate a life-without-parole sentence on an individual even if every strike is nonviolent.¹¹

In 2021, of those currently serving life or de facto life sentences, approximately 3,974 people were convicted of a drug-related offense, and 38 percent of these people are in the federal prison system.¹² Nationwide one of every 15 women in prison — over 6,600 women — is serving a sentence of life with parole, life without parole, or a de facto life sentence.¹³ Women of color are disproportionately subjected to extreme sentences compared to their white peers. Nationally, one of every 39 Black women in prison is serving life without parole compared with one of every 59 imprisoned white women.¹⁴

Life-Without-Parole Sentencing

Life without parole is the permanent removal of an individual from society with no chance of reentry, no hope of freedom. Life without parole is essentially a sentence to die in prison: people who are incarcerated are not released. They are categorically ineligible for parole, and once their post-conviction appeals are exhausted, their only chance for release is rarely granted commutation or clemency by the president or governor of their state or similarly infrequent compassionate release shortly before they die.¹⁵

Sentences of life without parole are virtually unheard of elsewhere in the world: The United States holds 83 percent of the world's population serving life without parole.¹⁶ Yet in the United

States the number of people serving life without parole has increased 66 percent since 2003, the highest rate it has ever been.¹⁷ As of 2020, the number of people serving life without parole in the United States was 55,945.¹⁸

Of those serving life without parole as of 2020, 2,340 people were convicted of nonviolent drug and property crimes, 60 percent of whom are incarcerated in federal prisons for drug offenses.¹⁹ ACLU research in 2013 documented cases of people serving life-without-parole sentences for nonviolent offenses as minor as shoplifting a jacket to the sale of a small amount of marijuana valued at \$10.²⁰ Such life-without-parole sentences, which are primarily driven by state habitual offender laws and federal mandatory minimum sentencing laws for drug offenses, are grotesquely out of proportion with the conduct they seek to punish.²¹

Notably, almost half of the people serving life without parole are 50 years old or older, and one in four are at least 60 years old.²² Further, half of aging people serving life without parole are Black and nearly 60 percent are people of color. This indefinite imprisonment of an aging population is despite research that has consistently shown that most individuals “age out” of criminal activity. Such lengthy sentences drain public resources and are counterproductive to public safety, and it has also been proven that life sentencing has no impact on an individual’s likelihood to commit a crime.²³

Juvenile Life-Without-Parole Sentencing

Life imprisonment of children is on the decline globally. Life imprisonment with the possibility of parole remains in about 63 countries for offenses committed by children. Since 2008, five countries have abolished life imprisonment as a criminal sentence for children entirely and in many countries where it remains, fewer children are serving these sentences.

The United States is the only nation that sentences children to life without parole for crimes committed before turning 18.²⁴ In 2020, there were 1,465 people in United States prisons serving life-without-parole sentences for crimes committed when they were children under 18.²⁵ Some of those who are currently serving life without parole were as young as 13 or 14 years old at the time of their crime.

Racial disparities are also stark in juvenile life-without-parole sentencing, and the proportion of Black children sentenced to life without parole has increased in new cases in the last 10 years. The Campaign for the Fair Sentencing of Youth found that 61 percent of people serving juvenile life-without-parole sentences prior to 2012 were Black, and of new sentences of life without parole imposed on children since 2012, 78 percent have been imposed on children of color, 70 percent of whom are Black.²⁶

Research has established that the biological and psychological differences between childhood and adulthood entitle young people to sentencing that takes into account their unique capacity for change and rehabilitation.²⁷ According to dozens of studies, the vast majority of adolescents who commit crimes grow out of those inclinations; only five to ten percent of troubled adolescents become chronic offenders as adults. In five decisions, the U.S. Supreme Court upheld the fact that “children are constitutionally different from adults in their levels of culpability” when

it comes to sentencing.²⁸ The U.S. Supreme Court ruled in *Graham v. Florida* (2010) that life imprisonment without the possibility of release constitutes “cruel and unusual” punishment for nonhomicide offenses committed by persons below 18 years of age.²⁹ In *Miller v. Alabama* (2012), the Court later struck down as unconstitutional mandatory sentences of life imprisonment without possibility of parole for children convicted of homicide offenses. Even when a juvenile was convicted of murder, the court said, a judge must be allowed to take a juvenile’s age into account, along with other relevant circumstances, in deciding the appropriate punishment.³⁰

Prior to the U.S. Supreme Court decision in *Miller*, there were approximately 2,600 people serving life without parole for crimes committed as children. Since the 2016 U.S. Supreme Court decision in *Montgomery v. Louisiana* retroactively applying *Miller*’s holding that mandatory life-without-parole sentences for children violate the Eighth Amendment, over 880 people previously serving juvenile life-without-parole sentences have been released.³¹ However, hundreds of people are still serving sentences of life imprisonment for crimes they committed as children, and states have varied significantly in their implementation of U.S. Supreme Court rulings. While 25 states and the District of Columbia have outlawed life-without-parole sentences for children and in nine other states there is no one serving the sentence despite its legality, in 16 states and in the federal system there are people currently serving life-without-parole sentences for crimes committed as children.³²

Recently, the ACLU settled a decade-long lawsuit against the State of Michigan over its unconstitutional practice of sentencing children to juvenile life without parole.³³ Prosecutors delayed resentencing hearings and sought life sentences in reviewed cases despite clear evidence the individual was rehabilitated. The settlement establishes a timeline for all prosecutors to promptly schedule the hearings that give individuals an opportunity to demonstrate their rehabilitation and right to release. The settlement also requires access to rehabilitative programming that had been previously denied.³⁴ In November 2021, the Inter-American Commission on Human Rights also analyzed the practice of sentencing children to life without parole in the United States and called on the country to abolish this extreme practice.³⁵ The report focused on Michigan, which allows a child over the age of 13 to be sentenced to life without parole. The Commission ultimately found that “the sentencing of juveniles to life without parole...incompatible with the International Covenant on Civil and Political Rights, a human rights treaty ratified by the United States.”³⁶

Further, many people are still imprisoned with de facto or virtual life sentences for crimes they committed as children. Research conducted by The Sentencing Project in 2020 documented that in prisons around the U.S., of the over 44,000 individuals serving virtual life sentences, more than 2,000 were under 18 at the time of their crime.³⁷ Such de facto life sentences still result in lifelong imprisonment even though they are not statutorily defined.³⁸ This data collection effort also identified 6,900 individuals serving statutorily defined life-with-parole sentences imposed on those who were under 18 at the time of their crime.

Harmful Effects of Life Imprisonment

Imprisonment with no release date causes significant psychological trauma.³⁹ Studies on the mental health consequences of indefinite detention have found that the indefinite terms of an

individual's confinement cause them to develop feelings of hopelessness and helplessness that lead to depressive symptoms, chronic anxiety, despair, and suicidal ideation.⁴⁰

People condemned to die in prison generally are housed in maximum- and medium-security facilities with few privileges, often far away from any relatives. These prisons are often overcrowded and dangerous places that provide inadequate food and hygiene, and limited access to fresh air and sunlight. Many life-sentenced people are also often held in prolonged solitary confinement, which only exacerbates their psychological trauma and is counterproductive to rehabilitation.⁴¹

As a matter of policy, some prisons also categorically deny or significantly limit drug treatment, counseling, vocational and educational programs, and other rehabilitative services to people who are sentenced to die in prison.⁴² People incarcerated for lengthy terms in state prisons particularly confront few opportunities for education, meaningful work, or productive programs or activities.

Some of these harsh conditions, many of which have worsened during the COVID-19 pandemic, violate international human rights standards. All persons deprived of their liberty are entitled to the rights and standards enshrined in international law, such as the International Covenant on Civil and Political Rights (ICCPR) ratified by the U.S. in 1992, the International Covenant on Economic, Social and Cultural Rights (ICESCR) signed but not ratified by the U.S., the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) ratified by the U.S. in 1994, and the UN Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules). Those serving life and long-term sentences are no exception.

Life Imprisonment in OAS Member States

Other countries within the Organization of Americans States (OAS) also sentence individuals to life imprisonment. For example, in Canada, certain crimes, such as high treason and first-degree murder, come with a mandatory sentence of life imprisonment and a period of parole ineligibility after 25 years.⁴³ Recently, however, in May 2022, Canada's Supreme Court ruled that the sentence of life without parole is unconstitutional and constitutes cruel punishment.⁴⁴ Cuba is another OAS member state that sentences individuals to life imprisonment. Cuba often applies its harsh sentencing to political protestors. Recently, Cuban judges sentenced over 550 Cuban civil rights protestors to more than 4,000 combined years of incarceration.⁴⁵ In another OAS member state, Belize, the Caribbean Court of Justice held in 2018 that its judges have discretion to impose a fixed term sentence for individuals convicted of murder, instead of life imprisonment or the death penalty.⁴⁶ In January 2021, Nicaragua's congress approved life imprisonment sentences, moving the country's maximum sentence from 30 years to life in prison.⁴⁷ In Colombia, the Constitutional Court ruled in September 2021 that the recent introduction of life imprisonment (with a possibility of review after 25 years) for the crimes of rape and sexual abuse of children was unconstitutional. The Court found that life sentences are contrary to human dignity, threaten the guarantee of resocialization of convicted persons and are a setback that risks dehumanizing the penal system.⁴⁸

According to the latest data, formal life imprisonment exists in 183 countries.⁴⁹ Life with parole is the most common sentence of life imprisonment and exists in 144 countries, while, 65 countries worldwide impose life-without-parole sentences. Additionally, the increasing use of de facto life sentences is difficult to calculate, but at least 64 countries have provisions for such virtual life sentences.⁵⁰ Overall, the global movement restricting the death penalty resulted in many states adopting life imprisonment as the most severe sentence.⁵¹ This global trend, however, violates applicable human rights standards and must be substantially limited.

At the 14th UN Congress on Crime Prevention and Criminal Justice in 2021, UN Assistant Secretary-General for Human Rights, Ilze Brands Kehris, expressed the UN's concern at how life imprisonment has replaced the death penalty as the most severe penal sanction in 149 countries and highlighted the “immense” costs to human dignity and human rights which gravely affect progress towards the 2030 Sustainable Development Agenda and its commitment to leave no one behind.⁵²

Limits to Life Imprisonment Under International Human Rights Law

There is increased recognition of human rights concerns around the use of life imprisonment. Life imprisonment as used in the United States, and globally, violates fundamental human rights standards, such as the ICCPR, the CAT, and the Nelson Mandela Rules.

International law, including both explicit treaty provisions and customary international law, guarantees that people convicted of crimes have a right to be rehabilitated. The ICCPR states that the purpose of the prison system is the “reformation and social rehabilitation,” indicating that every person sentenced to prison should have the opportunity to be rehabilitated back into society and lead law-abiding and self-supporting lives.⁵³ Rule 4 of the Nelson Mandela Rules reiterates that the purposes of imprisonment “can be achieved only if the period of imprisonment is used to ensure, so far as possible, the reintegration of such persons into society upon release so that they can lead a law-abiding and self-supporting life.”⁵⁴ Article 5(6) of the American Convention on Human Rights (ACHR) specifically requires re-adaptation to be a goal of prison: “Punishments consisting of deprivation of liberty shall have as an essential aim the reform and social re-adaptation of the prisoners.”⁵⁵ Even under the Rome Statute, which provides for the gravest offenses within the jurisdiction of the International Criminal Court—war crimes, crimes against humanity and genocide—life sentences must be reviewed after 25 years.⁵⁶

Proportionality between the severity of the sentence and the seriousness of the offense is required by three fundamental and interrelated human rights standards: the inherent dignity of the individual; the prohibition of cruel, inhuman, or degrading punishment; and the right to liberty. Both the ICCPR and the CAT prohibit “cruel, inhuman or degrading treatment or punishment.”⁵⁷ The ICCPR further recognizes that all persons deprived of their liberty shall be treated with humanity and with respect for the inherent dignity of the human person.⁵⁸ In order to be just, a sentence must be of a length and type which fits the crime and the circumstances of the person convicted of that crime. Proportionality must also be ensured within the sentence itself. This can be achieved by addressing the minimum period an individual must serve before they can be considered for release.

The Convention on the Rights of the Child (CRC) categorically prohibits the application of life imprisonment without parole to juveniles below the age of 18.⁵⁹ The Committee on the Rights of the Child, in its general comment No. 10, and the Human Rights Committee, in its general comment No. 21, confirmed that life imprisonment without the possibility of release is never an appropriate punishment for an offense committed by a child.⁶⁰ In a case against Argentina, the Inter-American Court of Human Rights found in 2013 that life imprisonment of children violates the ACHR, specifically the prohibitions on arbitrary imprisonment and on inhuman or degrading punishment.⁶¹ The decision drew heavily on the CRC, particularly the requirement that detention of children must be a last resort and for the shortest appropriate period of time.⁶² The ruling set a clear regional standard that life sentences for children violate their human rights and must be prohibited.

With respect to life imprisonment of children, the Human Rights Council, in its resolution 24/12, urged states to ensure that no one is sentenced to life imprisonment for an offense committed by children under 18 years of age. The UN Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Juan E. Méndez, in his 2015 report to the Human Rights Council, concluded that, “Life imprisonment and lengthy sentences, such as consecutive sentencing, are grossly disproportionate and therefore cruel, inhuman or degrading when imposed on a child.”⁶³ The Special Rapporteur also found that “mandatory sentences for children are similarly incompatible with the State’s obligation regarding children in conflict with the law and the prohibition of cruel, inhuman or degrading punishment.”⁶⁴

Recommendations

If granted, the hearing would involve the participation of leading experts, advocates, and formerly incarcerated individuals, who will brief the Commission on the troubling rise of life sentences and offer concrete solutions to address the issue. Accordingly, following the hearing, we recommend that the Commission issue guidance on the use of life imprisonment to ensure that sentencing laws, policies, and practices comply with relevant international law and standards, including the following:

- Eliminate life-without-parole sentences.
- Allow parole eligibility to occur within the person’s first 10 years of incarceration.
- Limit all sentences to a maximum of 20 years in prison.
- Invest resources into rehabilitative programming and treatment for people who are incarcerated.

¹ Prison Policy Initiative, *Mass Incarceration: The Whole Pie 2022*, by Wendy Sawyer and Peter Wagner (Mar. 14, 2022), <https://www.prisonpolicy.org/reports/pie2022.html>.

² Josh Rovner, *Juvenile Life Without Parole: An Overview*, The Sentencing Project (May 24, 2021), <https://www.sentencingproject.org/publications/juvenile-life-without-parole/>.

³ Ashley Nellis, *No End In Sight: America’s Enduring Reliance on Life Imprisonment*, The Sentencing Project (Feb. 17, 2021), <https://www.sentencingproject.org/publications/no-end-in-sight-americas-enduring-reliance-on-life-imprisonment/>.

⁴ *Id.*

⁵ Dirk Van Zyl Smit and Catherine Appleton, *LIFE IMPRISONMENT WORLDWIDE: A GLOBAL HUMAN RIGHTS ANALYSIS* (Cambridge: Harvard University Press, 2019).

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- ⁶ U.S. Department of Justice, Bureau of Justice Statistics, *Prisoners in 2020*, Table 4 (Dec. 2021), <https://bjs.ojp.gov/content/pub/pdf/p20st.pdf>.
- ⁷ The Sentencing Project, *supra* note 3.
- ⁸ *Id.*
- ⁹ ACLU, *Overcrowding and Overuse of Imprisonment in the United States* (May 2015), <https://www.ohchr.org/sites/default/files/Documents/Issues/RuleOfLaw/OverIncarceration/ACLU.pdf>.
- ¹⁰ ACLU, *ACLU Universal Periodic Review Submission For the 36th Session; 3rd Cycle* (March 24, 2020), https://www.aclu.org/sites/default/files/field_document/20.03.24_aclu_2019_upr_submission_2-pager_clean.pdf.
- ¹¹ *Id.*
- ¹² The Sentencing Project, *supra* note 3.
- ¹³ Ashley Nellis, *In the Extreme: Women Serving Life Without Parole and Death Sentences in the United States*, The Sentencing Project (Sept. 22, 2021), <https://www.sentencingproject.org/publications/in-the-extreme-women-serving-life-without-parole-and-death-sentences-in-the-united-states/>.
- ¹⁴ *Id.*
- ¹⁵ ACLU, *A Living Death: Life Without Parole for Nonviolent Offenses* (2013), https://www.aclu.org/sites/default/files/field_document/111813-lwop-complete-report.pdf.
- ¹⁶ Van Zyl Smit and Appleton, *supra* note 5.
- ¹⁷ The Sentencing Project, *supra* note 3.
- ¹⁸ The Sentencing Project, *supra* note 3.
- ¹⁹ Data is based on responses to public records requests filed by The Sentencing Project.
- ²⁰ ACLU, *supra* note 15.
- ²¹ *Id.*
- ²² The Sentencing Project, *Nothing But Time: Elderly Americans Serving Life Without Parole* (June 2022), <https://www.sentencingproject.org/wp-content/uploads/2022/06/Nothing-But-Time-Elderly-Americans-Serving-Life-Without-Parole.pdf>.
- ²³ Marc Mauer, *Long-Term Sentences: Time to Reconsider the Scale of Punishment*, The Sentencing Project (Nov. 5, 2018), <https://www.sentencingproject.org/publications/long-term-sentences-time-reconsider-scale-punishment/#:~:text=There%20are%20several%20reasons%20for,sentences%20add%20little%20to%20the>.
- ²⁴ The Sentencing Project, *supra* note 3.
- ²⁵ The Sentencing Project, *supra* note 2.
- ²⁶ Campaign for the Fair Sentencing of Youth, *Racial Disparities in Youth Sentencing* (March 2022), <https://cfsy.org/wp-content/uploads/Final-Racial-Disparities-Fact-Sheet-March-2022-1.pdf>.
- ²⁷ Press Release, ACLU, *ACLU-NJ Calls On New Jersey To Stop Sentencing Adolescents To Die In Prison* (June 16, 2014), <https://www.aclu.org/press-releases/aclu-nj-calls-new-jersey-stop-sentencing-adolescents-die-prison?redirect=criminal-law-reform-prisoners-rights/aclu-nj-calls-new-jersey-stop-sentencing-adolescents-die-prison>.
- ²⁸ *Montgomery v. Louisiana*, 136 S.Ct. 718, 736 (2016).
- ²⁹ *Graham v. Florida* 130 S. Ct. 2011, 2030 (2010).
- ³⁰ *Miller v. Alabama* 1325 S. Ct. 2455 (2012).
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- ³² Efrén Paredes, Jr., *Michigan Lawmakers Must Protect the Rights of Children and Join the Global Consensus*, ACLU (April 15, 2022), <https://www.aclu.org/news/human-rights/michigan-lawmakers-must-protect-the-rights-of-children-and-join-the-global-consensus>.
- ³³ Press Release, ACLU, *State Settles Decade-Long Lawsuit Challenging Unconstitutional Punishment Of Children With Life Behind Bars Without The Possibility Of Parole* (Sept. 30, 2020), <https://www.aclu.org/press-releases/state-settles-decade-long-lawsuit-challenging-unconstitutional-punishment-children>.
- ³⁴ *Id.*
- ³⁵ Inter-American Commission on Human Rights, *Juvenile Offenders Sentenced to Life Imprisonment Without Parole*, Report No. 448/21 (Nov. 19, 2021), available at https://www.dropbox.com/s/rz101iju62yy0o8/IACHR%20Findings%20and%20Recommendations%201_28_2022.pdf?dl=0.
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- ³⁷ The Sentencing Project, *Virtual Life Sentences* (Aug. 29, 2019), <https://www.sentencingproject.org/publications/virtual-life-sentences/>.
- ³⁸ *Id.*

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- ⁴⁰ *Id.* at 184-186.
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- ⁴² *Id.* at 189-190.
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- ⁴⁷ Penal Reform International, *Life Imprisonment* (2021), <https://www.penalreform.org/global-prison-trends-2021/life-imprisonment/>.
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- ⁵¹ *Id.*
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- ⁵⁴ UN General Assembly, United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules), adopted by the General Assembly, January 8, 2016, A/RES/70/175.
- ⁵⁵ American Convention on Human Rights art. 5(6), July 18, 1978, 1144 U.N.T.S. 123.
- ⁵⁶ The Rome Statute of the International Criminal Court art. 110(3), July 17, 1998, U.N. Doc. A/CONF.183/9.
- ⁵⁷ ICCPR, *supra* note 53, art. 7; Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, preamble, art. 16, 1465 U.N.T.S. 85 (opened for signature Dec. 10, 1984, entered into force June 26, 1987, ratified by the United States Oct. 21, 1994).
- ⁵⁸ ICCPR, *supra* note 53, art. 10.
- ⁵⁹ Convention on the Rights of the Child, art. 37(a), G.A. Res. 44/25, U.N. Doc. A/RES/44/25, annex, 44 U.N. GAOR Supp. (No. 49) at 167, U.N. Doc. A/44/49 (1989) (adopted November 20, 1989, entered into force September 2, 1990, signed by the United States February 16, 1995).
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- ⁶¹ Mendoza et al. v. Argentina, Preliminary Objections, Merits, and Reparations, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 260 (May 14, 2013).
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- ⁶⁴ *Id.*